

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK	3 7
JIMMY GONG and JIMMY'S SPORTSHOP, INC.	X

Plaintiff,

23-CV-05401 (PKC)(JMW)

-against-

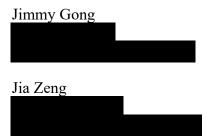
LIEUTENANT MARC TIMPANO, individually, SERGEANT WILLIAM RUSSELL, individually and THE COUNTY OF NASSAU,

DEFENDANTS' INITIAL DISCLOSURES PURSUANT TO FRCP 26(a)

Defendants.	
X	-

Defendants, Lt. Marc Timpano, Sgt. William Russell and the County of Nassau, appearing herein by their attorney, Thomas A. Adams, County Attorney of Nassau County, by Ralph J. Reissman, Deputy County Attorney, as and for their initial disclosures pursuant to Federal Rules of Civil Procedure 26(a), state as follows:

A. The following individuals are likely to have discoverable information that defendants may use to support their defense in this action.



Nassau County Police Lt. Marc Timpano 1490 Franklin Avenue Mineola, New York 11501

Nassau County Police Sgt. William Russell 1490 Franklin Avenue Mineola, New York 11501 Nassau County Det. Vincent Chiarelli 1490 Franklin Avenue Mineola, New York 11501

Nassau County Det. Thomas Calvert 1490 Franklin Avenue Mineola, New York 11501

Nassau County Det. Michael Maloney 1490 Franklin Avenue Mineola, New York 11501

Nassau County Det. Joseph Paduano 1490 Franklin Avenue Mineola, New York 11501

Nassau County Det. Michael Wall 1490 Franklin Avenue Mineola, New York 11501

Nassau County Det. Michael Dunn 1490 Franklin Avenue Mineola, New York 11501

Nassau County Det. John James 1490 Franklin Avenue Mineola, New York 11501

Nassau County Det. Patrick Rail 1490 Franklin Avenue Mineola, New York 11501

Nassau County Det. Lance Zimmerman 1490 Franklin Avenue Mineola, New York 11501

Nassau County Det. Justin Moore 1490 Franklin Avenue Mineola, New York 11501

Nassau County Assistant District Attorney Jeremy Glicksman 262 Old County Road Mineola, New York 11501 Trijicom

49385 Shafer Avenue

P. O. Box 930059

Wixom, Michigan

EOtech

46900 Port Street

Plymouth, Michigan 48170

B. Pursuant to Rule 26(A)(1)(a)(ii) of the Federal Rules Civil Procedure, defendants

describe the following documents and tangible things defendants have in their possession which

defendants may use to support their defenses: (1) Files maintained by the Nassau County Police

Department, 1490 Franklin Avenue, Mineola, New York 11501, copies of which may be made

available for inspection and copying by plaintiff, and (2) Files maintained by the Nassau County

District Attorney's Office, 262 Old Country Road, Mineola, New York 11501, copies of which

may be made available for inspection and copying by plaintiff, or may be produced by counsel in

the process of pretrial discovery.

C. Computation of damages by disclosing party: Not applicable.

D. Insurance information: Not applicable.

Defendants reserve the right to revise and/or supplement the foregoing disclosures as

information becomes available during the course of litigation.

Dated: Mineola, New York

November 6, 2023

THOMAS A. ADAMS

Nassau County Attorney

Attorney for Defendants

By: /s/ Ralph J. Reissman RALPH J. REISSMAN

Deputy County Attorney

1 West Street

Mineola, New York 11501

(516) 571-3046